

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC, 20554

In the Matter of                    )  
Creation of a Low                    )  
Power Radio                        )  
Service                                )                   MB Docket No. 99-25

My name is Timothy Stone, and I strongly support any actions the Federal Communications Commission can take to expand and support the Low Power FM radio service which is vital to returning localism to the radio airwaves of communities across America. In my role as President of the Board of Trustees of the Seacoast Arts and Cultural Alliance, the LPFM license holder for Portsmouth Community Radio WSCA-LP, I have personally seen the community building that results from establishment of a LPFM station. Our journey began more than five years ago when a community group recognized the value of establishing a community radio station to serve the Greater Portsmouth area. WSCA-LP went on the air September 12, 2004 in conjunction with a Prometheus Radio Project Barnraising and has since been broadcasting 24/7 providing locally produced news, cultural, health, civic, youth, and music programs presented by programmers of all ages. WSCA-LP, an entirely volunteer-run station, has quickly become a vital part of the fabric of our community. Already, WSCA-LP offers more than 18 hours per day of live locally hosted programs including talks shows on culture, food, politics, civics, pet care, health, the environment, and more. Programmers range from 12 year olds to seniors from all walks of life. WSCA-LP was even recently voted Best Vox Populi (Voice of the People) by a State-wide magazine. I cannot stress enough the contribution the station is making to our community by providing a voice to community members and covering issues of true importance to our listeners, a role that was long since been abandoned by other radio stations in our region.

Considering the value of LPFM stations such as WSCA-LP, to their communities, I urge the FCC to take the needed actions to protect LPFM stations like WSCA-LP and allow establishment of additional LPFM stations. I consider the following actions vital to achieve these goals.

1. In light of the Mitre report findings, promote the restoration of second adjacent co-channel spacing for LPFM stations to open up channels in more congested urban areas.
2. Improve FCC communication with LPFM applicants. Even though the FCC had mailing and email addresses for our organization, we didn't receive a single form of communication from the FCC until receiving our construction permit, over 2-1/2 years after filing our application! Undoubtedly, many LPFM applicants, whose applications were thrown into limbo and delayed by the perversely titled Radio Broadcasting Preservation Act of 2000, were not aware of the remedial filing windows because the FCC made little or no effort to notify applicants that such filing windows existed.
3. Grant LPFM stations primary status and put LPFM stations on equal status with full power stations. To think that LPFM stations such as WSCA-LP could be driven off the air by a commercial radio station, and that LPFMs should be considered secondary to full power commercial stations is a travesty. In today's environment of conglomerate owned commercial radio stations, the value and contribution of LPFM stations to communities must be recognized and preserved.

4. The FCC should take steps to give LPFM stations spectrum priority over translators which do nothing more than rebroadcast feeds from remote studios and offer little or no local programming. Due to the limited availability of channels, LPFM stations which provide local programming should also be given precedence over existing translators unless the translator programming originates locally, for instance within 50 kilometers of the translator.

5. The FCC must halt the issuance of translator licenses to sham entities. The wholesale issuance of translator licenses to such organizations eliminates potential opportunities for establishment of LPFM stations which truly serve the communities to which they broadcast.

6. The FCC should allow for the natural transitions in the "ownership" in local community organizations. A change in a Board of Directors or Trustees of greater than 50% over several years is very common, if not required by many non-profit organization bylaws. The FCC should take action to readily accommodate for such natural transitions in non-profit organizations. At the same time however, the FCC must also ensure that illegal speculation in LPFM applications is prevented.

Over six years ago the FCC embarked on a brilliant initiative by establishing the LPFM program. I urge the Commission to make the corrections necessary to allow the program to continue to grow and provide existing LPFMs the spectrum security that they deserve considering the enormous contribution that so many LPFM stations are making to their communities.

Thank you for the opportunity to provide these comments.

Respectfully Submitted,

Timothy Stone  
President - Board of Trustees  
Seacoast Arts and Cultural Alliance  
Portsmouth Community Radio